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13
14 IN THE UNITED STATES DISTRICT COURT
15 FOR THE EASTERN DISTRICT OF CALIFORNIA

16
17 UNITED STATES OF AMERICA,
18 Plaintiff,
19 vs.
20 RYAN WILSON,
21 Defendant.

Case No. 1:21-cr-00315-ADA-BAM

**STIPULATION TO CONTINUE STATUS
CONFERENCE; ORDER**

Date: April 12, 2023
Time: 1:00 p.m.
Judge: Hon. Barbara A. McAuliffe

17 IT IS HEREBY STIPULATED by and between the parties through their respective
18 counsel, Assistant United States Attorney Kimberly Sanchez, counsel for plaintiff, and Assistant
19 Federal Defender Reed Grantham, counsel for Ryan Wilson, that the status conference currently
20 scheduled for February 22, 2023, at 1:00 p.m. may be continued to April 12, 2023, at 1:00 p.m.

21 The parties agree and stipulate, and request that the Court find the following. The
22 government has provided discovery in this matter. The defense remains in the process of
23 reviewing the discovery, conducting further investigation, and discussing the matter with his
24 client. Specifically, the defense has made the government aware of the pending investigative
25 efforts of the defense, which includes the need to visit the location of the alleged offense located
26 in the mountains of the Sierra National Forest. This investigative effort has been delayed since
27 mid-December as a result of weather conditions at the location of the alleged offense. The
28 defense has remained in contact with the government regarding this and the parties are awaiting

1 confirmation from the officers involved so that this visit can be accomplished. Accordingly, the
2 parties request that the status conference in this matter be continued to permit this continued
3 defense investigation, as well as for possible plea negotiations.

4 The requested continuance will conserve time and resources for the parties and the Court.
5 Counsel for defendant believes that failure to grant the above-requested continuance would deny
6 him the reasonable time necessary for effective preparation, taking into account the exercise of
7 due diligence. The government does not object to the continuance.

8 Based on the above-stated findings, the ends of justice served by continuing the case as
9 requested outweigh the interest of the public and the defendant in a trial within the original date
10 prescribed by the Speedy Trial Act. For the purpose of computing time under the Speedy Trial
11 Act, 18 U.S.C. § 3161, et seq., within which trial must commence, the time period of February
12 22, 2023, to April 12, 2023, inclusive, is deemed excludable pursuant to 18 U.S.C. §§
13 3161(h)(7)(A) and 3161(h)(7)(B)(i), (ii) and (iv) because it results from a continuance granted by
14 the Court at defendant's request on the basis of the Court's finding that the ends of justice served
15 by taking such action outweigh the best interest of the public and the defendant in a speedy trial.

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Respectfully submitted,

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PHILLIP A. TALBERT
United States Attorney

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Date: February 15, 2023

/s/ Kimberly Sanchez
KIMBERLY SANCHEZ
Assistant United States Attorney
Attorney for Plaintiff

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HEATHER E. WILLIAMS
Federal Defender

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Date: February 15, 2023

/s/ Reed Grantham
REED GRANTHAM
Assistant Federal Defender
Attorney for Defendant
RYAN WILSON

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ORDER

IT IS SO ORDERED that the status conference is continued from February 22, 2023, to **April 12, 2023 at 1:00 p.m. before Magistrate Judge Barbara A. McAuliffe**. Time is excluded pursuant to 18 U.S.C. §§ 3161(h)(7)(A) and 3161(h)(7)(B)(i), (ii) and (iv).

IT IS SO ORDERED.

Dated: **February 15, 2023**

/s/ Barbara A. McAuliffe

UNITED STATES MAGISTRATE JUDGE